

EXHIBIT C

TO THE DECLARATION OF CLAUDE D. MONTGOMERY, ESQ.

*In Re: City of Detroit, Debtor*

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*Governor Richard D. Snyder  
October 9, 2013*

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*Moretti Group  
471 W. South Street  
Suite 41B  
Kalamazoo, MI 49007  
800-536-0804*



Original File 100913RS.TXT

Win-1 - Scripter with Word Index

09:55:47 1 Q. Okay. Let me direct your attention -- strike that.  
09:55:54 2 Let me back up.

09:55:55 3 Did you put your comments in writing to  
09:55:58 4 anyone -- your comments about the June 14th, 2013  
09:56:02 5 proposal, did you put your comments in writing to  
09:56:04 6 anyone whether by letter or email or phone text or  
09:56:08 7 in any other written format?

09:56:09 8 A. I don't believe so. I don't believe so.

09:56:13 9 Q. Let me now turn your attention to page 109 of  
09:56:21 10 Exhibit 3, and I'm going to in particular read the  
09:56:30 11 second line of the third bullet point from the  
09:56:34 12 bottom. It says "There must be significant cuts in  
09:56:39 13 accrued vested pension amounts for both active and  
09:56:42 14 currently retired persons."

09:56:45 15 Were you aware that the proposal said this?

09:56:49 16 A. I'm aware the proposal said that in the context that  
09:56:53 17 this was to be a negotiation and a mutual agreement  
09:56:56 18 between parties.

09:56:56 19 Q. My only question was --

09:56:57 20 A. Yeah.

09:56:57 21 Q. -- were you aware that this proposal said this?

09:57:00 22 A. Yes.

09:57:00 23 Q. And you were aware that at the time that you signed  
09:57:05 24 what's been marked as Exhibit 2, the July 18th  
09:57:07 25 letter, you were aware that the proposal contained

09:57:10 1 the language I just read, correct?

09:57:12 2 A. Yes.

09:57:14 3 Q. So you were aware when you signed the July 18th,  
09:57:24 4 2013 letter that it was Kevyn Orr's view that there  
09:57:30 5 had to be significant cuts in accrued pension  
09:57:32 6 liabilities, correct?

09:57:34 7 A. I would say it was Kevyn Orr putting a proposal out  
09:57:38 8 to parties to say he believed this was necessary to  
09:57:41 9 achieve an outcome, that they would need to agree to  
09:57:44 10 that.

09:57:45 11 Q. I'm not sure that was responsive. Let me try that  
09:57:49 12 question again.

09:57:49 13 A. Okay.

09:57:50 14 Q. Isn't it correct that at the time that you signed  
09:57:54 15 your July 18th letter that you were aware that it  
09:58:00 16 was Kevyn Orr's position that there had to be  
09:58:01 17 significant cuts in accrued pension benefits?

09:58:04 18 A. Yes.

09:58:05 19 Q. Did you speak to Kevyn Orr about -- strike that.

09:58:12 20 Did you agree with that position as of  
09:58:15 21 July 18th? And by the position I mean that there  
09:58:19 22 had to be significant cuts in accrued pension  
09:58:21 23 liabilities?

09:58:23 24 A. The approval of my letter was not addressing that as  
09:58:27 25 an issue. It was about authorizing a bankruptcy.

## CERTIFICATE

STATE OF MICHIGAN                    )  
  ) SS:  
COUNTY OF OAKLAND                    )

I, LAUREL A. JACOBY, Certified Shorthand reporter, a Notary Public, hereby certify that I recorded in shorthand the examination of GOVERNOR RICHARD D. SNYDER, the deponent in the foregoing deposition; and that prior to the taking of said deposition the deponent was first duly sworn, and that the foregoing is a true, correct and complete transcript of the testimony of said deponent.

I further certify that no request was made for submission of the transcript to the deponent for reading and signature and that no such submission was made.

I also certify that I am not a relative or employee of a party or an attorney for a party; or financially interested in the action.

LAUREL A. JACOBY, CSR-5059, RPR

Notary Public, Oakland County, Michigan

My commission expires: 9/1/18

Dated: This 11th day of October, 2013.